

EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

3 JACQUES DESROSIERS, et al,)
4 Plaintiffs)
5 -VS-) CA No. 22-11674-PBS
6 SIG SAUER INC.,) Pages 6-1 - 6-128
7 Defendant)

JURY TRIAL - DAY SIX

BEFORE THE HONORABLE PATTI B. SARIS
UNITED STATES DISTRICT JUDGE

United States District Court
1 Courthouse Way, Courtroom 19
Boston, Massachusetts 02210
July 21, 2025, 8:42 a.m.

LEE A. MARZILLI
OFFICIAL COURT REPORTER
United States District Court
1 Courthouse Way, Room 7200
Boston, MA 02210
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1 A P P E A R A N C E S:

2 RYAN D. HURD, ESQ. and SAMUEL A. HAAZ, ESQ.,
3 Saltz Mongeluzzi Bendesky, P.C., One Liberty Place,
1650 Market Street, 52nd Floor, Philadelphia, Pennsylvania,
19103, for the Plaintiffs.4 STEPHEN SEMENZA, ESQ., Law Offices of Stephen Semenza,
5 100 Pier 4 Boulevard, Boston, Massachusetts, 02210, for the
Plaintiffs.6 JAMES M. CAMPBELL, ESQ. and ALAINA DEVINE, ESQ.,
7 Campbell Conroy & O'Neil, P.C., 20 City Square, Suite 300,
Boston, Massachusetts, 02129, for the Defendant.8 KRISTEN E. DENNISON, ESQ., Littleton Joyce Ughetta &
9 Kelly, LLP, 2460 North Courtenay Parkway, Suite 24, Merritt
Island, Florida, 32953, for the Defendant.

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		<u>I N D E X</u>			
	<u>WITNESS</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>
3	SEAN TONER				
4	By Mr. Haaz:	9			
5	By Ms. Dennison:		76		
6	By Mr. Haaz:			113	
7	By Ms. Dennison:				122
8					
9	<u>EXHIBITS</u>	<u>RECEIVED IN EVIDENCE</u>			
10	56	13			
11	245	29			
12	247	30			
13	221	33			
14	19	35			
15	229	38			
16	236	43			
17	232	48			
18	226	52			
19	381	57			
20	320	61			
21	375	68			
22	24	73			
23	552	80			
24					
25					

1 necessary feature of the gun, right?

2 A. Uhm, that's part of our marketing brochure, is that we
3 have safety features that we were targeting in the design.

4 Q. Okay, I'm going to mark as exhibit what's been premarked
5 as 221, move it into evidence, and publish it for the jury.

6 (Exhibit 221 received in evidence.)

7 Q. I'm showing you Exhibit 221. Do you recognize this
8 document?

9 A. Yes, I do.

10 Q. And this is Sig Sauer's Safety Without Compromise
11 Timetable. Do you see that?

12 A. Yes, it is.

13 Q. And if we look at the promise that Sig Sauer made, "We've
14 design safety elements into every necessary feature of this
15 pistol. From the trigger to the striker and even the magazine,
16 the P320 won't fire unless you want it to."

17 That is what Sig Sauer told its customers, correct?

18 A. Yes, it is.

19 Q. It's certainly fair for customers to be able to rely on
20 the statements that Sig Sauer makes about its products, right?

21 A. Yes.

22 Q. And this statement means that you designed safety elements
23 specifically into the trigger, correct?

24 A. Yes, we did.

25 Q. Do you know if this statement was made when the tabbed